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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE: SECOND
SUPPLEMENTAL CRIME-FRAUD
LETTER**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court’s Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed, filed in connection with Plaintiffs’ Second Supplemental Crime-Fraud Letter. The attachments accompanying the Second Supplemental Letter contain material that Defendant Meta Platforms, Inc. (“Meta”), has designated as “Highly Confidential - Attorneys Eyes Only,” as defined in the in the parties’ Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the “Protective Order”):

Document	Portions to be Filed Under Seal	Basis for Sealing Portion of Document
Plaintiffs’ Letter	Highlighted Portions	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Appendix A	Full Document	Refers to material designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit A	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit B	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit C	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit D	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit E	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit F	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit G	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit H	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit I	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit J	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Exhibit K	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit L	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”
Exhibit M	Full Document	Designated by Meta as “Highly Confidential – Attorneys’ Eyes Only”

Because Meta continues to chronically over-designate much of the record in this case, Plaintiffs must provisionally file the above-referenced documents under seal even though Plaintiffs do not believe they contain material that warrants sealing.

Dated: February 13, 2025

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

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